

EXHIBIT “D”

to Revised Response to Plaintiffs’ Motion to Compel

**List of Documents Produced Contemporaneously
with Defendants’ Revised Response to Motion to Compel
(Filed in Court as Defendants’ Fourth Supplemental Responses
to Plaintiffs’ First Requests for Production of Documents)**

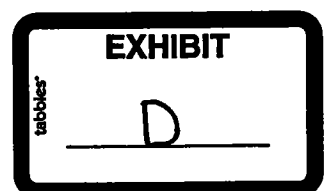


EXHIBIT "D"

**Documents Supplemented by Defendants' in
Response to 1st Request for Production,
contemporaneous with Defendant's Revised Response to
Plaintiffs' Motion to Compel, filed on June 24, 2005**

Document Request No. 1: Any and all documents in your possession, custody or control relating to each of the named plaintiffs for the entire time that they have been known to DHS, including but not limited to, case files and other records created or maintained by DHS, and any public or private agencies that have contracted with DHS to provide child welfare services or that otherwise provide such services.

Response No. 1: Defendants are producing the following:

- 1) An un-redacted copy of case record document from Plaintiff Olivia Y's case record (Bates No. DHS Olivia Y. 000003); and
- 2) Psychological evaluations from Plaintiff Cody B's case record (Bates No. DHS Cody B. 000088-00010).

Document Request No. 4: All documents in your possession, custody or control, reflecting or concerning the data elements currently capable of being input into MACWIS and all documents reflecting all types of reports that MACWIS is currently capable of generating.

Response No. 4: Defendants are producing Cross Reference Screen Shots from Statewide Automated Child Welfare Information Systems SACWIS Assessment Review Guide (Bates No. DHS 033109-033302).

Document Request No. 8: All internal and external assessments, audits, evaluations or reviews of DFCS operations and practice in your possession, custody or control, including but not limited to documents generated by the Quality Improvement Unit, 6-month reviews, Peer reviews, Program Integrity Unit reviews and all documents regarding any response, corrective action or "action plan" requested or undertaken in relation to those assessments, audits, evaluations and reviews.

Response No. 8: Defendants are producing the following:

- 1) Quality Improvement Quarterly Report, [Lauderdale] County Report: Out of Home Cases (Placement Cases Only) for Q3, FY 2002-2003 (Bates No. DHS 038529-038555);
- 2) Quality Improvement Quarterly Report, Regional [VI-S] Report: Out of Home Cases (Placement Cases Only) for Q3, FY 2002-2003 (Bates No. DHS 038556-038582); and

- 3) Quality Improvement State Quarterly Report Placement Cases. Region IE, dated May 28, 2003 (Bates No. 038583-038629).

Document Request No. 13: *The Mississippi State Advisory Board's Annual Assessment of DFCS provided outcome data for each year from 2000 to present*

Response No. 13: DHS states that it does not have "State Level Citizens Review Board DFCS Five-Year Plan Review and Recommendations" for the data year 2000. The report for the date year 2004 has not yet been prepared. Defendants are producing for data year 2001, "State Level Citizens Review Board DFCS Five Year Plan Review and Recommendations" dated June 14, 2002 (Bates No. DHS 033089-033108).

Document Request No. 23: *All documents in your possession, custody or control regarding staffing cutbacks, hiring freezes or temporary assignments at DFCS.*

Response No. 23: Defendants are producing the following:

- 1) May 9, 2005 Temporary Assignment Extension Notification Memo to Gloria Adams (Bates No. DHS 038468);
- 2) February 4, 2005 Temporary Assignment Notification Memo to Gloria Adams (Bates No. DHS 038469);
- 3) December 22, 2004 Temporary Assignment Notification Memo to Martha McDaniel (Bates No. DHS 038470);
- 4) January 25, 2005 Temporary Assignment Notification Memo to Dorothy Manual, Annie Gee and Alyce Clark (Bates No. DHS 038471);
- 5) January 25, 2005 Temporary Assignment Notification Memo to Mary Ann Crook (Bates No. DHS 038472);
- 6) January 25, 2005 Temporary Assignment Notification Memo to Billy Mangold (Bates No. DHS 038473);
- 7) February 9, 2005 Temporary Assignment Notification Memo to Kathy Triplett (Bates No. DHS 038474);
- 8) February 9, 2005 Temporary Assignment Notification Memo to Teresa Jackson (Bates No. DHS 038475);

- 9) March 1, 2005 Temporary Assignment Notification Memo to Daisy Lee (Bates No. DHS 038476);
- 10) March 24, 2005 Temporary Assignment Notification Memo to Melody Hamilton (Bates No. DHS 038477);
- 11) April 1, 2005 Temporary Assignment Notification Memo to Cathryn Robinson (Bates No. DHS 038478);
- 12) April 1, 2005 Temporary Assignment Notification Memo to Clara Kilgore (Bates No. DHS 038479);
- 13) March 22, 2005 Temporary Assignment Notification Memo to Clara Kilgore (Bates No. DHS 038480); and
- 14) April 13, 2005 Temporary Assignment Notification Memo to All Regional Directors (Bates No. DHS 038481).

Document Request No. 30: *The current State Plan submitted pursuant to Title IV-B and Title IV-E of the federal Social Security Act, including but not limited to documents required by 42 U.S.C. §§622(b), 629(b), 671, 5106a(d) and 5106(c).*

Response No. 30: Defendants are producing "Attachment 'F'" Revised Strategic Plan for 2004" (Bates No. DHS 038482-038520).

Document Request No. 35: *Any and all documents relating to child maltreatment reports, child abuse and neglect investigations, critical incident reports, child fatality reports or special reviews regarding the abuse or neglect of children in DHS custody or of children in homes or facilities where children in DHS custody reside, including facilities not licensed by DHS.*

Response No. 35: Defendants' produce herewith the following:

- 1) Summary of Maltreated Children while in Custody in a Placement (Bates No. DHS 038630); and
- 2) County of Maltreated Children While In Custody in a Placement (Bates No. DHS 038631).